

WEIL, GOTSHAL & MANGES LLP  
Stephen Karotkin (*pro hac vice*)  
(stephen.karotkin@weil.com)  
Ray C. Schrock, P.C. (*pro hac vice*)  
(ray.schrock@weil.com)  
Jessica Liou (*pro hac vice*)  
(jessica.liou@weil.com)  
Matthew Goren (*pro hac vice*)  
(matthew.goren@weil.com)  
767 Fifth Avenue  
New York, NY 10153-0119  
Tel: 212 310 8000  
Fax: 212 310 8007

KELLER BENVENUTTI KIM LLP  
Tobias S. Keller (#151445)  
(tkeller@kbbkllp.com)  
Jane Kim (#298192)  
(jkim@kbbkllp.com)  
650 California Street, Suite 1900  
San Francisco, CA 94108  
Tel: 415 496 6723  
Fax: 650 636 9251

*Attorneys for Debtors and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric  
Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead  
Case, No. 19-30088 (DM).*

Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case) (Jointly Administered)

**DECLARATION OF STEPHEN KAROTKIN  
IN SUPPORT OF *EX PARTE* MOTION OF  
DEBTORS PURSUANT TO B.L.R. 9006-1  
REQUESTING ORDER SHORTENING TIME  
FOR HEARING ON DEBTORS' MOTION  
PURSUANT TO 11 U.S.C. §§ 105 AND 363 AND  
FED. R. BANKR. P. 9019 FOR ENTRY OF AN  
ORDER (I) APPROVING CASE RESOLUTION  
CONTINGENCY PROCESS AND (II)  
GRANTING RELATED RELIEF**

Related Document: Dkt. [6398, 6400]

[No hearing requested]

1 I, Stephen Karotkin, pursuant to section 1746 of title 28 of the United States Code,  
2 hereby declare under penalty of perjury that the following is true and correct to the best of my  
3 knowledge, information, and belief:

4 1. I am a partner at Weil, Gotshal & Manges LLP, attorneys for PG&E Corporation and  
5 Pacific Gas and Electric Company, as debtors and debtors in possession (collectively, “**PG&E**” or the  
6 “**Debtors**”). Weil was retained and employed to serve as the Debtors attorneys in these Chapter 11  
7 Cases by Order dated April 9, 2019 [Docket No. 1298].

8 2. I submit this declaration in support of the Motion of the Debtors (the “**Motion to**  
9 **Shorten**”), pursuant to Rule 9006-1 of the Bankruptcy Local Rules for the United States Bankruptcy  
10 Court for the Northern District of California, for entry of an order shortening time for a hearing on  
11 April 1, 2020, at 10:00 a.m. (Prevailing Pacific Time), on the *Debtors’ Motion Pursuant to 11 U.S.C.*  
12 *§§ 105 and 363 and Fed. R. Bankr. P. 9019 for Entry of an Order (i) Approving Case Resolution*  
13 *Contingency Process and (ii) Granting Related Relief* (the “**Motion**”), filed contemporaneously  
14 herewith.<sup>1</sup> Pursuant to the Motion to Shorten, the Debtors are also requesting that written objections,  
15 if any, be due by 4:00 p.m. (Prevailing Pacific Time) on March 30, 2020.

16 3. As set forth in the Motion and in the Motion to Shorten, the Case Resolution  
17 Contingency Process, which together with the filing of the Utility’s March 13, 2020 brief in the Plan  
18 OII that incorporates the Debtors’ OII Proposals, and the other undertakings described in the Motion,  
19 address the issues raised in the Governor’s December 13 Letter and, the Debtors believe, will lead to  
20 the support of the Governor’s Office for the Plan.

21 4. As also set forth in the Motion and the Motion to Shorten, approval of the Case  
22 Resolution Contingency Process will facilitate the Debtors’ ability to timely exit these Chapter 11  
23 Cases, provide a positive signal to the financing markets, and further solidify support for the Plan and  
24 the likelihood of a smooth and largely consensual resolution of these Chapter 11 Cases in keeping  
25 with the June 30, 2020 deadline of AB 1054. I believe approval of the Motion and securing the  
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27 <sup>1</sup> Capitalized terms used but not defined herein have the meanings ascribed to them in the Motion or  
28 the Motion to Shorten, as applicable.

1 Governor's support as described therein is particularly time-sensitive, given the current stage of these  
2 Chapter 11 Cases. The Debtors' Disclosure Statement with respect to the Plan has been approved by  
3 the Bankruptcy Court and the solicitation of votes with respect to the Plan will commence shortly.  
4 Accordingly, with the Chapter 11 Cases proceeding towards the confirmation stage, consideration of  
5 the Motion and the Case Resolution Contingency Process on an expedited basis is appropriate under  
6 the circumstances.

7 5. Given the exigencies and the sensitivities concerning the relief requested in Motion, it  
8 was not feasible to seek consent from other parties prior to the filing of the Motion to Shorten.  
9 However, cause exists to hear the Motion on shortened time, as described therein.

10 I declare under penalty of perjury that, to the best of my knowledge and after reasonable  
11 inquiry, the foregoing is true and correct and that this declaration was executed at Scarsdale, New  
12 York, on March 20, 2020.

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14 /s/ Stephen Karotkin  
15 Stephen Karotkin  
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